Remarks/Arguments:

Claims 2-11 and 13-23 had been pending in the above-referenced patent application prior to the present Amendment. By action of the present Amendment, Cls. 6, 9, 14 and 22 are amended.

Claim 22 has been amended to incorporate the limitations of Claim 6. The examiner indicated in the Office Action of February 4, 2005 that Claim 6 would be allowable if rewritten in independent form. Claim 6 has been amended to delete material incorporated in Claim 22.

The examiner's rejection under 35 USC 103(a) of the instant application as unpatentable over Myers (U.S Patent Patent Application 20020129756 A1, now issued as U.S. Patent 6,508,194) in view of Hull (Hull *et al*, US Patent 5,101,753) is respectfully traversed. There is no teaching or suggestion in Myers which would lead one skilled in the arts to combine the forward inflatable tubular structure and central floor section of the watercraft of Hull with the attachment means disclosed by Myers, and in fact, Myers expressly teaches away from such combination.

Pontoon boats, in the sense of pontoon watercraft particularly equipped for fishing, have been known for a decade or more. Such pontoon boats are also frequently referred to as "kick-boats". See, for example, Merrett *et al*, US Patent 5,878,688, and "Buck's Bags®, Inc." catalog (copies of excerpts of both enclosed). Although most such craft are provided with means for propulsion by rowing, they are also designed to be propelled by the user's kicking motions with his/her feet in the water–hence the term "kick boat". Many users attach swim fins to their feet to facilitate such foot-actuated propulsion. Typically, the user will use oars to travel to the desired location for fishing, then use the kicking action, also known as "finning" to keep the craft in position and orientation, or to move the craft short distances, while fishing. In this way, the user's hands are left free to manipulate fishing gear while his/her feet position and move the craft.

The addition of a forward inflatable tubular structure connecting the pontoons and a central floor section would interfere with or prevent the propulsion of the boat by kicking.

Furthermore, users enter or "board" such pontoon boats by wading into shallow water and sitting on the seat provided. Most users wear some form of waterproof waders while using such pontoon boats. Again, the addition of a forward inflatable tubular structure connecting the pontoons and a central floor section would interfere with the ability of the user to enter such pontoon boats in this manner.

Such use of pontoon boats is reflected in Myers. Thus, in ¶ [0012] "A footrest provides many practical advantages, for example, for generally relaxing, for resting and stretching finning muscles, and for supporting a user's feet in an elevated position to clear bottom hazards" [emphasis added], and in ¶ [0014] "It is recognized that it would be beneficial to provide adequate leg support above the kick boat's foot rest." [emphasis added]. This language in Myers clearly teaches away from the provision of a central floor section in the watercraft of Myers. Buck's Bags, a leading supplier of pontoon boats for fishing, does not offer for sale any pontoon boats incorporating a central floor section, nor could any other supplier be found who offers such a pontoon boat.

Further, in Myers ¶[0012] "Unfortunately, some conventional wrap-around design obstructs a user's entry and exit from the vessel. This problem increases with increasing water depth." [emphasis added], and ¶[0013] "A framing system which eliminates front cross members offers convenient walk-in access to the vessel's seating area.." [emphasis added]. This language in Myers clearly teaches away from the provision of a forward inflatable tubular structure connecting the (lateral) pontoons.

Hull also teaches away from combining features of Myers with features of Hull

To facilitate discussion of Hull, amended Claim 22 is reproduced here in "clean" form:

22. (Currently amended) An inflatable watercraft comprising:

> left and right lateral inflatable tubular flotation structures, each connected to a forward inflatable tubular flotation structure, said flotation structures disposed at least on either side and on the forward end of a central floor section;
>
> attachment means integrally connected to said lateral flotation structures;
>
> a support structure detachably and lockably attachable to said attachment means, said supporting structure comprising:
>
> > gunwale mounting plates mounted on and supported by the lateral inflatable tubular flotation structures comprising the lateral gunwales of the inflatable watercraft;
> >
> > a seat support frame spanning said gunwale mounting plates;
> >
> > means for detachably and lockably attaching said seat support frame to said gunwale mounting plates; and
> >
> > a swivelable seat detachably attachable to said support structure; and
> >
> > oarlock supports attached to said support structure.

The amendment to Claim 22 is believed to clearly distinguish the present application over Hull and also over Myers in view of Hull. The invention of Hull requires a watercraft equipped with an integral motor mount (which motor mount comprises elements **2**, **3** and **10** of Figure 1 of Hull; see col.2 lines 4-6 and 10-11), with the seat support structure (and the weight of the user) supported by the motor mount. This structure, by inference, teaches away from the invention of the present application, where the seat support structure is mounted on and solely supported by the lateral gunwales. (The central support bar **40** of the invention of the present application may, in certain embodiments, be extended forward to contact the forward inflatable tubular structure, but such extension would bear little or no weight of the user; it contacts the forward structure only to support the weight of an anchor or drag deployed from the extension.)

(Hull's use of the term "motor mount support" is somewhat confusing. In col. 2 line 2-3 the term is used for element **2** of Figure 1 (which might better be referred as the motor mount, motor mounting board or transom), while element **3** is referred to as the frame work attaching the motor mount to the raft or boat. However, in col. 2 lines 21-30, he describes (lines 25-26) setting the support mounts on "motor mount support **2**"; it might have been clearer if the description referred to setting the support mounts on frame work **3**. It appears that Hull uses the term "motor mount support" to include elements **2** and **3**, as well as element **10**, the mounting patches on the raft.)

Tthe invention of Hull also differs in another significant feature from the invention of the present invention: the support frame of Hull is not detachably and lockably attachable to the support structure, but merely rest upon it held in place solely by gravity. See col. 2 lines 21-30 and Claim 4.

These differences between the invention of Hull and that of the present application are not just semantic, but are reflective of the essential objectives of the respective inventions. The invention taught by Hull requires a different type of inflatable watercraft as the starting point–a watercraft with an integral motor mount support. While such watercraft are commercially available, they have an essential difference with respect to the more general purpose inflatable watercraft of the present invention, and that difference is a reflection of the intended use. It should be noted that Figure 1 of the Hull patent illustrates an inflatable watercraft without oars or oarlocks, because that watercraft is intended for use primarily with a motor. The invention of the present application was made to be applicable to inflatable watercraft of the raft type in general, whether equipped with a motor mount support or not. Addition of a motor mount support to a general purpose watercraft would not be a trivial undertaking, and it is difficult to see the motivation one would have to make such addition in order to make an attachment such as is described and claimed in the present application. Also, in the invention of Hull, the weight of the user would be distributed between the stern of the watercraft and the lateral gunwales. In the invention of the present application, the user's weight would be distributed only to the lateral gunwales, which is believed to result in a watercraft with greater stability. There is no teaching or suggestion in Hull which would lead one skilled in the art to devise the attachment of the invention of the present application, nor would a one practicing the invention of Hull be led to devise such attachment.

The absence of detachable and lockable attachment means is also an essential design feature of the invention of Hull, and is emphasized in, e.g. col. 1, lines 51-53 and Claim 4. Again, there is no teaching or suggestion that would lead one skilled in the art to abandon this feature in favor of the detachably and lockably attachable support structure of the present invention.

Thus there is no teaching or suggestion in Hull which would lead one skilled in the art to devise the distinguishing features of the invention of the present application–the detachably and lockably attachable support structure mounted entirely on and supported solely by the lateral gunwales–for use with the watercraft of Hull, either taken alone or with reference to Myers.

In summary, the patent of Hull and the patent application of Myers teach and disclose features of the respective inventions described therein which are essential to the inventions – a support structure resting on but not attached to a motor mount, in the case of Hull, and a watercraft free of structures which would prevent or impede "finning" or boarding the watercraft from the front by wading in the water in the case of Myers -- and those distinguishing features teach away from the invention of the present application, either taken alone or in combination.

It is believed that the amendments and remarks contained herein place the present application in condition for allowance.